

C. DUKES SCOTT
EXECUTIVE DIRECTOR

1441 Main Street, Suite 300
Columbia, SC 29201



Phone: (803) 737-0800
Fax: (803) 737-0801

DAN E. ARNETT
CHIEF OF STAFF

jnelson@regstaff.sc.gov

Jeffrey M. Nelson
Counsel for ORS

VIA EFILING

May 14, 2008

Mr. Charles L.A. Terreni
Chief Clerk/Administrator
South Carolina Public Service Commission
101 Executive Center Drive
Columbia, SC 29210

Re: ORS Comments to the Commission's Notice of Proposed Interruption of Service Regulations under Docket 2007-445-A

Dear Mr. Terreni:

Following is a list of comments by the ORS Staff regarding the Commission's Notice of Drafting under Docket 2007-445-A to amend its regulations regarding interruption of service for water and wastewater utilities. The ORS appreciates the opportunity afforded it by the Commission to comment on these proposed changes to its regulations.

103-514 & 714. References to "the commission" receiving notices of violations should be removed in subsection (C) of both regulations as the Commission may, in some cases, eventually be asked to pass judgment in a case or cases arising out of such service issues. ORS suggests that the requirement for utilities to notify the Commission of such service issues be removed from this regulation to eliminate the possibility of potential conflicts and to simplify the utilities reporting requirements.

103-514 & 714. ORS recommends moving sections 103-514.C and 714.C to 103-570 and 103-770, respectively. This recommendation is based on the fact that these subsections seem to address issues of "standards and quality of service", which is the title of Subarticle 7, and are not limited to the issue of "interruptions of service", which is the title of regulations 103-514 and 103-714.

103-514 & 714. ORS recommends moving proposed sections 103-514.D and 714.D to 103-570 and 103-770, respectively. This recommendation is based on the fact that these subsections seem to address issues of "standards and quality of service", which is the title of Subarticle 7, and are not limited to the issue of "interruptions of service", which is the title of regulations 103-514 and 103-714.

Thank you for allowing the Office of Regulatory Staff the opportunity to be a part of the Commissions continuing development of these regulations.

Yours Truly,

A handwritten signature in black ink, appearing to read 'Jeffrey M. Nelson', with a long horizontal flourish extending to the right.

Jeffrey M. Nelson

JMN/pjm